

LINDA MILLER SAVITT, SBN 094164
PHILIP L. REZNIK, SBN 204590
BALLARD, ROSENBERG, GOLPER & SAVITT LLP
500 North Brand Boulevard
Twentieth Floor
Glendale, CA 91203-9946
Telephone: 818-508-3700
Facsimile: 818-506-4827

(SPACE BELOW FOR FILING STAMP ONLY)

LAWRENCE A. MICHAELS, SBN 107260
SARAH T. WIRTZ, SBN 217434
VERONICA T. VON GRABOW, SBN 259859
MITCHELL SILBERBERG & KNUPP LLP
11377 West Olympic Boulevard
Los Angeles, California 90064-1683
Tel: 310-312-2000 o Fax: 310-312-3100

CAROL A. HUMISTON, SBN 115592
Senior Assistant City Attorney
City of Burbank
275 East Olive Avenue
Burbank, California 91510
Tel: 818-238-5707 o Fax: 818-238-5724
Attorneys for Defendant CITY OF BURBANK,
including the Police Department of the City of Burbank

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

OMAR RODRIGUEZ; CINDY GUILLEN-
GOMEZ; STEVE KARAGIOSIAN;
ELFEGO RODRIGUEZ; AND JAMAL
CHILDS,

Plaintiffs,

-vs-

BURBANK POLICE DEPARTMENT;
CITY OF BURBANK; TIM STEHR;
KERRY SCHILF; JAMIE "J.J." PUGLISI;
DAN YADON; KELLY FRANK; PAT
LYNCH; MIKE PARRINELLO; AARON
KENDRICK; DARIN RYBURN; AND
DOES 1 THROUGH 100, INCLUSIVE.

Defendants.

CASE NO: BC 414602

[Assigned to Hon. Joanne O'Donnell,
Dept. 37]

[Discovery Referee: Hon. Diane Wayne,
Ret.]

**DECLARATION OF PHILIP L.
REZNIK IN SUPPORT OF
DEFENDANT'S MOTION IN
LIMINE NO. 6 FOR AN ORDER
EXCLUDING THE TESTIMONY OF
OLIVER "LEE" DRUMMOND**

Trial: April 25, 2011
Time: 9:00 a.m.
Dept. 37

DECLARATION OF PHILIP L. REZNIK

I, Philip L. Reznik hereby declare that:

1. I am a member of the State Bar of California, licensed to practice in all courts in the state and am an and an associate in the law firm of Ballard, Rosenberg, Golper & Savitt, LLP, counsel of record to defendant City of Burbank herein. I have personal knowledge of the following facts and, if asked, could and would testify competently thereto.

2. Attached hereto as Exhibits L and M are a true and correct printouts of a series of emails between Plaintiffs' counsel and defense counsel between April 5, 2011 and April 12, 2011. I have bracketed the emails referenced herein.

3. At or about 5:19 pm on the evening of Tuesday, April 5, 2011, I sent an email to Plaintiff's counsel Sol Gresen asking him to confirm that he and Plaintiff Cindy Guillen's designated expert Lee Drummond were available for deposition on Monday April 11, 2011. (Exh. L at 4.)

4. At or about 5:37 pm, Mr. Gresen responded by an email that he would check with Mr. Drummond and get back to me on Wednesday, April 6, 2011. (Exh. L at 4.)

5. As of 7:21 pm on Wednesday, April 6, Mr. Gresen had not gotten back to me as promised. At that time, I sent him another email, again asking about Dr. Drummond's availability for deposition on Monday, April 11. (Exh. L at 3-4.)

6. At or about 10:54 am on the morning of Thursday, April 7, Mr. Gresen responded with an email stating that he needed to work out a better date in the week of April 11 for Mr. Drummond's deposition, and that he would have a better idea of Mr. Drummond's availability by the following afternoon – Friday, April 8. (Exhibit L at 3.)

7. At or about 11:38 am, defense counsel Linda Savitt responded with an email reminding Mr. Gresen that trial was set to commence the following week and we needed to depose Guillen's experts "ASAP". (Exh. M at 7.)

8. At or about 12:24 pm, Mr. Gresen responded with an email stating that the first day of trial would "probably" be no earlier than April 27. (Exh. M at 7.)

1 9. At or about 1:00 pm, Ms. Savitt responded: "I think I'm still entitled to the
2 expert's deposition in advance of trial." (Exh. M at 7.)

3 10. Mr. Gresen did not back to me about Mr. Drummond's availability on Friday,
4 April 8, nor did he get back to me on Monday, April 11.

5 11. On or about 8:10 pm on the night of Monday, April 11, I sent another email to
6 Mr. Gresen asking him to let me know by noon the following day – Tuesday, April 12 –
7 which day that week Mr. Drummond could appear for his deposition. (Exh. L at 3.)

8 12. At or about 10:10 am on the morning of Tuesday, April 12, Mr. Gresen
9 responded that he expected to hear from Mr. Drummond by the end of the day regarding his
10 availability for deposition. (Exh. L at 3.)

11 13. Mr. Gresen never got back to me regarding Mr. Drummond's availability for
12 deposition.

13
14 I declare, under penalty of perjury under the laws of the State of California that the
15 above facts are true to my knowledge.

16 Signed this 14th day of April, 2011, at Glendale, California.

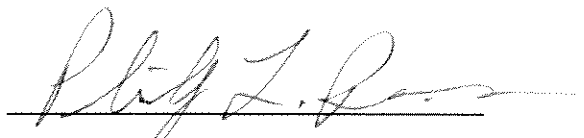
17
18
19 
20 PHILIP L. REZNIK, Declarant

EXHIBIT L

Philip L. Reznik

From: Solomon Gresen [seg@rglawyers.com]

Sent: Tuesday, April 12, 2011 10:10 AM

To: Philip L. Reznik

Subject: RE: Deposition of Guillen

Phil:

We are expecting to hear from him today regarding his availability.

From: Philip L. Reznik [mailto:preznik@brgslaw.com]

Sent: Monday, April 11, 2011 8:10 PM

To: Solomon Gresen

Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica; Michaels, Larry

Subject: RE: Deposition of Guillen

Sol:

I never heard back from you as to which day this week Lee Drummond is available for deposition. Please let me know by noon tomorrow. I would prefer not to have to pick a date unilaterally. Thank you.

From: Solomon Gresen [mailto:seg@rglawyers.com]

Sent: Thursday, April 07, 2011 10:54 AM

To: Michaels, Larry; Philip L. Reznik

Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica

Subject: RE: Deposition of Guillen

All:

I need to work out a better date next week for Mr. Drummond. He is coming from Fresno, and I should have a better idea of his availability by tomorrow afternoon.

Plaintiff's deposition, however, can go forward on Monday as scheduled. Please confirm – 9:00 a.m., City Hall

From: Michaels, Larry [mailto:LAM@msk.com]

Sent: Thursday, April 07, 2011 7:53 AM

To: Philip L. Reznik; Solomon Gresen

Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica

Subject: RE: Deposition of Guillen

Your office was also going to advise about Ms. Guillen's deposition on Monday morning. Please advise on that as well, ASAP.

From: Philip L. Reznik [mailto:preznik@brgslaw.com]

Sent: Wednesday, April 06, 2011 7:21 PM

4/13/2011

To: Solomon Gresen

Cc: svr@rglawyers.com; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Michaels, Larry; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica

Subject: RE: Deposition of Guillen

Sol,

Per below, you were going to get back to me today about deposing Drummond on Monday afternoon. Please advise on this ASAP.

From: Solomon Gresen [mailto:seg@rglawyers.com]

Sent: Tuesday, April 05, 2011 5:37 PM

To: Philip L. Reznik

Subject: RE: Deposition of Guillen

I need to talk with Lee.

I'll get back to you tomorrow.

thanks

From: Philip L. Reznik [mailto:preznik@brgslaw.com]

Sent: Tuesday, April 05, 2011 5:19 PM

To: Solomon Gresen; Steven Rheuban

Cc: Linda C. Miller Savitt; Michaels, Larry; Chumiston@ci.burbank.ca.us; Leslie Reheis; Arutyunyan, Lusine; von Grabow, Veronica; Shannon Ford; Daphne Johnson

Subject: RE: Deposition of Guillen

Importance: High

Please confirm you can appear with Mr. Drummond on Monday, April 11 at 2pm. Since you will already be at City Hall, let's do it there.

From: Michaels, Larry [mailto:LAM@msk.com]

Sent: Tuesday, April 05, 2011 5:09 PM

To: Solomon Gresen

Cc: Shannon Ford; Linda C. Miller Savitt; Humiston, Carol Ann; Wirtz, Sarah; von Grabow, Veronica; Philip L. Reznik

Subject: RE: Deposition of Guillen

I believe Linda or Phil will be handling Mr. Drummond's deposition, so I am passing your proposal on that subject to them to respond.

From: Solomon Gresen [mailto:seg@rglawyers.com]

Sent: Tuesday, April 05, 2011 5:04 PM

To: Michaels, Larry

Cc: Shannon Ford

Subject: FW: Deposition of Guillen

Mr. Michaels,

I will have to check with Shannon, but it sounds fine.

4/13/2011

4

Should we schedule Lee Drummond for the afternoon if everyone is available?

Solomon E. Gresen, Esq.
LAW OFFICES OF RHEUBAN & GRESEN
15910 Ventura Boulevard, Suite 1610
Encino, California 91436
tel: 818.815.2727
fax: 818.815.2737
seg@rglawyers.com
www.rglawyers.com

This message/attachments are confidential to the user of the e-mail to which it was addressed & may be privileged. If you are not the addressee do not copy, forward, disclose or use any part of the message/attachments. If you've received this message in error, notify the sender immediately by phone or e-mail & then delete it. Internet communications aren't guaranteed to be secure/error-free as e-mail could be intercepted, corrupted, lost, late or contain viruses. The sender does not accept liability for any errors or omissions in the context of this message. Any opinions contained in this message are those of the author and are not given or endorsed by Rheuban & Gresen through which this message is sent unless otherwise clearly indicated in this message and the authority of the author to so bind Rheuban & Gresen is duly verified.

From: Michaels, Larry [mailto:LAM@msk.com]
Sent: Tuesday, April 05, 2011 4:46 PM
To: Solomon Gresen; Daphne Johnson; Steven Rheuban; Shannon Ford; Annette Goldstein
Cc: Humiston, Carol Ann; Linda C. Miller Savitt; Wirtz, Sarah; von Grabow, Veronica
Subject: Deposition of Guillen

Mr. Gresen,

When we spoke yesterday morning you advised me that since you had completed your El Monte trial, you would now make Ms. Guillen available for the completion of her previously noticed deposition. I would like to complete the deposition next Monday morning, April 11, 2011. I expect it to take about 3 hours. If possible, I would like to begin at 9:00 a.m., so we can finish before lunch. As usual, the deposition will be at the City Hall campus.

Please advise whether you and Ms. Guillen are willing to appear.

Lawrence A. Michaels | Mitchell Silberberg & Knupp LLP | 11377 West Olympic Blvd., Los Angeles, CA 90064 | direct: 310 312-3766 | fax: 310 312-3787 | lam@msk.com | www.msk.com

THE INFORMATION CONTAINED IN THIS E-MAIL MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT AN INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, USE, DISSEMINATION, FORWARDING OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. PLEASE NOTIFY US IMMEDIATELY BY REPLY E-MAIL OR TELEPHONE, AND DELETE THE ORIGINAL MESSAGE AND ALL ATTACHMENTS FROM YOUR

4/13/2011

5

SYSTEM. THANK YOU.

This Message Contains Information Which May Be Confidential And Privileged.
Unless You Are The Addressee (Or Authorized To Receive For The Addressee),
You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information
Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

This Message Contains Information Which May Be Confidential And Privileged.
Unless You Are The Addressee (Or Authorized To Receive For The Addressee),
You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information
Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

This Message Contains Information Which May Be Confidential And Privileged.
Unless You Are The Addressee (Or Authorized To Receive For The Addressee),
You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information
Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

EXHIBIT M

Philip L. Reznik

From: Linda C. Miller Savitt
Sent: Thursday, April 07, 2011 1:00 PM
To: 'Solomon Gresen'; Michaels, Larry; Philip L. Reznik
Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; India Thompson; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica
Subject: RE: Deposition of Guillen
i think I'm still entitled to the expert's depo in advance of trial.

From: Solomon Gresen [mailto:seg@rglawyers.com]
Sent: Thursday, April 07, 2011 12:24 PM
To: Linda C. Miller Savitt; Michaels, Larry; Philip L. Reznik
Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; India Thompson; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica
Subject: RE: Deposition of Guillen

My understanding from yesterday's hearing is that we are not starting on the 13th. There is a 10 day trial ahead of us with priority. We are having the FSC on the 13th, but the motions in limine will be heard on the first day of trial, whenever that is – probably no earlier than the 27th.

Please let me know if the above does not conform to your understanding.

From: Linda C. Miller Savitt [mailto:lsavitt@brgslaw.com]
Sent: Thursday, April 07, 2011 11:38 AM
To: Solomon Gresen; Michaels, Larry; Philip L. Reznik
Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica
Subject: RE: Deposition of Guillen

next week is trial. I need to get the expert depo ASAP.

From: Solomon Gresen [mailto:seg@rglawyers.com]
Sent: Thursday, April 07, 2011 10:54 AM
To: Michaels, Larry; Philip L. Reznik
Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica
Subject: RE: Deposition of Guillen

All:

I need to work out a better date next week for Mr. Drummond. He is coming from Fresno, and I should have a better idea of his availability by tomorrow afternoon.

Plaintiff's deposition, however, can go forward on Monday as scheduled. Please confirm – 9:00 a.m., City Hall

From: Michaels, Larry [mailto:LAM@msk.com]

4/13/2011

7

Sent: Thursday, April 07, 2011 7:53 AM

To: Philip L. Reznik; Solomon Gresen

Cc: Steven Rheuban; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica

Subject: RE: Deposition of Guillen

Your office was also going to advise about Ms. Guillen's deposition on Monday morning. Please advise on that as well, ASAP.

From: Philip L. Reznik [mailto:preznik@brgslaw.com]

Sent: Wednesday, April 06, 2011 7:21 PM

To: Solomon Gresen

Cc: svr@rglawyers.com; Shannon Ford; Daphne Johnson; Humiston, Carol Ann; Michaels, Larry; Linda C. Miller Savitt; Leslie Reheis; Wirtz, Sarah; von Grabow, Veronica

Subject: RE: Deposition of Guillen

Sol,

Per below, you were going to get back to me today about deposing Drummond on Monday afternoon. Please advise on this ASAP.

From: Solomon Gresen [mailto:seg@rglawyers.com]

Sent: Tuesday, April 05, 2011 5:37 PM

To: Philip L. Reznik

Subject: RE: Deposition of Guillen

I need to talk with Lee.

I'll get back to you tomorrow.

thanks

From: Philip L. Reznik [mailto:preznik@brgslaw.com]

Sent: Tuesday, April 05, 2011 5:19 PM

To: Solomon Gresen; Steven Rheuban

Cc: Linda C. Miller Savitt; Michaels, Larry; Chumiston@ci.burbank.ca.us; Leslie Reheis; Arutyunyan, Lusine; von Grabow, Veronica; Shannon Ford; Daphne Johnson

Subject: RE: Deposition of Guillen

Importance: High

Please confirm you can appear with Mr. Drummond on Monday, April 11 at 2pm. Since you will already be at City Hall, let's do it there.

From: Michaels, Larry [mailto:LAM@msk.com]

Sent: Tuesday, April 05, 2011 5:09 PM

To: Solomon Gresen

Cc: Shannon Ford; Linda C. Miller Savitt; Humiston, Carol Ann; Wirtz, Sarah; von Grabow, Veronica; Philip L. Reznik

Subject: RE: Deposition of Guillen

I believe Linda or Phil will be handling Mr. Drummond's deposition, so I am passing your proposal on that subject to them to respond.

4/13/2011

8

From: Solomon Gresen [mailto:seg@rglawyers.com]
Sent: Tuesday, April 05, 2011 5:04 PM
To: Michaels, Larry
Cc: Shannon Ford
Subject: FW: Deposition of Guillen

Mr. Michaels,

I will have to check with Shannon, but it sounds fine.

Should we schedule Lee Drummond for the afternoon if everyone is available?

Solomon E. Gresen, Esq.
LAW OFFICES OF RHEUBAN & GRESEN
15910 Ventura Boulevard, Suite 1610
Encino, California 91436
tel: 818.815.2727
fax: 818.815.2737
seg@rglawyers.com
www.rglawyers.com

This message/attachments are confidential to the user of the e-mail to which it was addressed & may be privileged. If you are not the addressee do not copy, forward, disclose or use any part of the message/attachments. If you've received this message in error, notify the sender immediately by phone or e-mail & then delete it. Internet communications aren't guaranteed to be secure/error-free as e-mail could be intercepted, corrupted, lost, late or contain viruses. The sender does not accept liability for any errors or omissions in the context of this message. Any opinions contained in this message are those of the author and are not given or endorsed by Rheuban & Gresen through which this message is sent unless otherwise clearly indicated in this message and the authority of the author to so bind Rheuban & Gresen is duly verified.

From: Michaels, Larry [mailto:LAM@msk.com]
Sent: Tuesday, April 05, 2011 4:46 PM
To: Solomon Gresen; Daphne Johnson; Steven Rheuban; Shannon Ford; Annette Goldstein
Cc: Humiston, Carol Ann; Linda C. Miller Savitt; Wirtz, Sarah; von Grabow, Veronica
Subject: Deposition of Guillen

Mr. Gresen,

When we spoke yesterday morning you advised me that since you had completed your El Monte trial, you would now make Ms. Guillen available for the completion of her previously noticed deposition. I would like to complete the deposition next Monday morning, April 11, 2011. I expect it to take about 3 hours. If possible, I would like to begin at 9:00 a.m., so we can finish before lunch. As usual, the deposition will be at the City Hall campus.

4/13/2011

Please advise whether you and Ms. Guillen are willing to appear.

Lawrence A. Michaels | Mitchell Silberberg & Knupp LLP | 11377 West Olympic Blvd., Los Angeles, CA 90064 |
direct: 310 312-3766 | fax: 310 312-3787 | lam@msk.com | www.msk.com

THE INFORMATION CONTAINED IN THIS E-MAIL MESSAGE IS INTENDED ONLY FOR THE PERSONAL AND CONFIDENTIAL USE OF THE DESIGNATED RECIPIENTS. THIS MESSAGE MAY BE AN ATTORNEY-CLIENT COMMUNICATION, AND AS SUCH IS PRIVILEGED AND CONFIDENTIAL. IF THE READER OF THIS MESSAGE IS NOT AN INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY REVIEW, USE, DISSEMINATION, FORWARDING OR COPYING OF THIS MESSAGE IS STRICTLY PROHIBITED. PLEASE NOTIFY US IMMEDIATELY BY REPLY E-MAIL OR TELEPHONE, AND DELETE THE ORIGINAL MESSAGE AND ALL ATTACHMENTS FROM YOUR SYSTEM. THANK YOU.

This Message Contains Information Which May Be Confidential And Privileged. Unless You Are The Addressee (Or Authorized To Receive For The Addressee), You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

This Message Contains Information Which May Be Confidential And Privileged. Unless You Are The Addressee (Or Authorized To Receive For The Addressee), You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

This Message Contains Information Which May Be Confidential And Privileged. Unless You Are The Addressee (Or Authorized To Receive For The Addressee), You May Not Use, Copy Or Disclose To Anyone The Message Or Any Information Contained In The Message.

If You Have Received The Message In Error, Please Advise
The Sender By Reply E-Mail info@brgslaw.com, And delete The Message.
Do Not Forward Without Author's Permission.

Thank You Very Much.

1 **PROOF OF SERVICE**

2 I am a citizen of the United States, and am employed in the County of Los
3 Angeles in the office of a member of the bar of this Court at whose directions this service
4 was made. I am over the age of 18, and not a party to the within action. My business address
is Ballard, Rosenberg, Golper & Savitt, 500 North Brand Boulevard, Twentieth Floor,
Glendale, California 91203-9946.

5 On April 14, 2011, I served the foregoing document described as:
6 **DECLARATION OF PHILIP L. REZNIK IN SUPPORT OF DEFENDANT'S**
7 **MOTION *IN LIMINE* NO. 6 FOR AN ORDER EXCLUDING THE TESTIMONY OF**
OLIVER "LEE" DRUMMOND on the interested parties in this action, by placing a true
copy thereof in a sealed envelope addressed as follows:

8 Solomon E. Gresen, Esq.
9 Steven V. Rheuban, Esq.
10 Law Offices of Rheuban & Gresen
11 15910 Ventura Boulevard, Suite 1610
12 Encino, CA 91436
13 Tel: (818) 815.2727
14 Fax: (818) 815-2737
15 seg@rglawyers.com
16 Attorneys for Plaintiffs

17
18 **VIA FACSIMILE;** and

19 **(BY FEDEX)** I am "readily familiar" with the firm's practice of collection
20 and processing correspondence for delivery by Federal Express. Under that
21 practice, in the ordinary course of business, it would be deposited with
22 Federal Express on that same day with directions for next day delivery, with
23 the Federal Express fees guaranteed to be paid by Ballard, Rosenberg, Golper
24 & Savitt, LLP.

25 X **(BY ELECTRONIC MAIL)** I sent the above-mentioned documents via
26 electronic mail addressed as set forth above.

27 X **(BY MAIL)** and personally placing such envelope with postage fully prepaid
28 for collection and mailing on the above-referenced date following the
ordinary business practices of this office. I am readily familiar with our
office's practice for collection and processing of correspondence for mailing
with the United States Postal Service. In the ordinary course of business,
correspondence, including said envelope, will be deposited with the United
States Postal Service at Glendale on the above-referenced date.

 (BY PERSONAL SERVICE) I delivered such envelope(s) by hand to the
above-addressee(s).

25 I declare under penalty of perjury that the foregoing is true and correct under
26 the laws of the State of California. Executed on April 14, 2011 at Glendale, California.

27 
28 Leslie Reheis